

RESPONSE TO 3100101

LTV Steel Company

April 8, 1987



Certified Mail-Return Receipt Requested

Mr. Harry A. Chappel, P.E.
Acting Manager, Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: 0316500002 - Cook County
LTV Steel - Chicago Works
ILD056623598
Compliance File

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IEPA-DLPC



Dear Mr. Chappel:

This letter is in response to your inquiry of March 25, 1987 regarding the status of the LTV Steel-Chicago Works facility with respect to certain requirements of 35 Illinois Administrative Code Part 725, Subpart G: Closure and Post-Closure.

The apparent noncompliance is based on an agency inspection dated August 7, 1986 at which six drums containing D008 material were noted within the facility, having accumulation dates in excess of 90 days. Owner and professional engineer certifications were dated July 14 and 16, 1986, respectively, for the closure plan approved by IEPA on January 21, 1986.

An investigation of the circumstances involved has been conducted by LTV Steel and presented as follows:

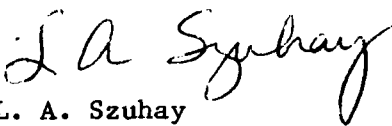
Facility records show that there were five (5) shipments of drummed D008 material from the storage area in 1986. No D008 material was in storage at the time the engineering contractor conducted sampling activities in early April, 1986. All D008 drums were removed for disposal prior to testing as required by this approved closure plan. Since the storage area was empty during the closure testing, the certification was valid. Plant operations continued, additional D008 material was generated and placed into temporary storage after April testing until mid-September, 1986 when the operation was shut down and generation of D008 terminated. All D008 materials on-site were subsequently removed for disposal.

Plant personnel had interpreted the applicability of the 90 day storage rule as becoming effective upon agency formal acceptance of closure certification. In addition, IEPA personnel performed the site inspection on August 7 because the facility was considered to continue to hold a RCRA permit until closure certification was accepted.

In consideration of the above, in order to resolve this issue and since all testing and drum removal activities were completed in 1986, LTV Steel proposes a recertification of closure for the drum storage facility by the operator and the independent certified professional engineer. LTV Steel respectfully requests that Illinois EPA allow LTV Steel to recertify closure for the drum storage area.

Should you have any questions regarding this matter, please contact John M. Potwora at 216/429-6536.

Sincerely,


L. A. Szuhay
Manager-Solid and Hazardous Waste
Environmental Control

LAS/fh

cc: Mr. Gino Bruni
Field Operations Section
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